

**THE LAW OFFICES OF  
AVRUM J. ROSEN, PLLC**  
ATTORNEYS AT LAW  
38 NEW STREET  
HUNTINGTON, NEW YORK 11743

.....  
Telephone (631) 423-8527  
Facsimile (631) 423-4536  
e-mail address: ajrlaw@aol.com

AVRUM J. ROSEN  
FRED S. KANTROW

KIMBERLY I. BERSON  
DEBORAH L. DOBBIN  
KATHERINE A. GERACI

ALLAN B. MENDELSON \*  
MICHAEL J. O'SULLIVAN \*  
(\* of counsel)

February 25, 2013

VIA ECF AND E-MAIL  
Karamvir S. Dahiya, Esq.  
Dahiya Law Offices LLC  
350 Broadway  
Suite 412  
New York, New York 10013

Re: In re Khan, Chapter 7, Case No. 10-46901-ess  
Kramer v. Mahia, Adv. Pro. No. 11-1520-ess

Dear Mr. Dahiya:

As you are aware, there is a Court Ordered deposition of your client to take place at my office on February 27, 2013 at 11:00 a.m. As you are also aware, the Court directed that you were to comply with all Discovery demands by February 1, 2013. You did not do so. On that date, you e-mailed me certain documents. I specifically responded to you that a formal response to the Discovery Demand was required and I even gave you three additional days past the Judge's Order to provide same. A copy of my e-mail in response to your e-mail is annexed hereto. On February 1, 2013 later in the day you sent me an additional document, and I again reiterated my demand that you give a formal document demand so that I knew exactly what documents your client had, what had been produced, and what was not available. I received no response. On February 4, 2013 you sent me more documents, but still did not identify the documents, give me any formal response to the Discovery Demand, and in that e-mail, you told me that further documents would be provided as they became available. Those e-mails are also attached. This would lead one to the inescapable conclusion that all of the documents had not yet been provided and there were other documents that were extant. Since that time, I have received no further documents. I remind you, yet again, of the Text Order entered by Judge Stong which stated that failure to abide by this Order would be potentially punishable by contempt. It is not my job to sift through documents and to try and determine if you have complied with the document demand.

Please be advised that if a formal response to the documents is not e-mailed to me by 2:00 p.m. on the 26<sup>th</sup> of February, I am, by copy of this letter requesting that Judge Stong set up a Discovery conference call. By making this request for a further conference with the Court I am not waiving any rights to seek contempt of either you or your client for your apparent repeated failures to comply with the Discovery Demand in this case.

Please be guided accordingly. Thank you.

Very truly yours,

/s/Avrum Rosen  
Avrum J. Rosen

AJR:em

Encl.

cc: Chambers of Hon. Elizabeth Stong

Subj: **Re: Paperwork within our custody and control. Karamer v. Mahia closing statement**  
Date: 2/1/2013 4:50:49 P.M. Eastern Standard Time  
From: [karam@bankruptcypundit.com](mailto:karam@bankruptcypundit.com)  
To: [ajrlaw@aol.com](mailto:ajrlaw@aol.com), [ajrlaw@aol.com](mailto:ajrlaw@aol.com), [kberson@avrumrosenlaw.com](mailto:kberson@avrumrosenlaw.com), [kgeraci@avrumrosenlaw.com](mailto:kgeraci@avrumrosenlaw.com),  
[emeade@avrumrosenlaw.com](mailto:emeade@avrumrosenlaw.com), [lstalker@avrumrosenlaw.com](mailto:lstalker@avrumrosenlaw.com), [dldobbin@avrumrosenlaw.com](mailto:dldobbin@avrumrosenlaw.com),  
[fkantrow@avrumrosenlaw.com](mailto:fkantrow@avrumrosenlaw.com)

Attached is HUD statement. You have these papers and you had them from the previous attorney. As any other papers become available we will send your way.

On 2/1/2013 3:59 PM, Karamvir Dahiya wrote:  
>

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Karamvir Dahiya, Esq.

DAHIYA LAW GROUP LLC  
Attorneys  
350 Broadway Suite 412  
New York, New York 10013  
212-766-8000  
Fax 212-766-8001  
Cell: 646-420-9000

Monday, February 25, 2013 AOL: AJRLAW

Subj: Re: Paperwork within our custody and control. Karamer v. Mahia  
Date: 2/1/2013 4:56:13 P.M. Eastern Standard Time  
From: AJRLAW@aol.com  
To: karam@bankruptcypundit.com, fkantraw@avrumrosenlaw.com  
CC: dkramer@kramerpllc.com

Dear Mr. Dahiya:

As you were told in Court, you were to respond to the discovery demands. That does not mean you just send documents (and certainly not redacted documents). You send a pleading saying what you have and what you do not have. You sign it under penalties of perjury. Please provide a proper response by the end of the day on Monday.

Avrum Rosen

Law Offices of Avrum J. Rosen, PLLC  
38 New Street  
Huntington, New York 11743  
Phone: 631-423-8527  
Fax 631-423-4536  
ajrlaw@aol.com

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In a message dated 2/1/2013 4:00:35 P.M. Eastern Standard Time, karam@bankruptcypundit.com writes:

--  
Karamvir Dahiya, Esq.

DAHIYA LAW GROUP LLC  
Attorneys  
350 Broadway Suite 412  
New York, New York 10013  
212-766-8000  
Fax 212-766-8001  
Cell: 646-420-9000

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Subj: **Paperwork within our custody and control. Karamer v. Mahia**  
Date: 2/1/2013 4:00:35 P.M. Eastern Standard Time  
From: [karam@bankruptcypundit.com](mailto:karam@bankruptcypundit.com)  
To: [ajrlaw@aol.com](mailto:ajrlaw@aol.com), [ajrlaw@aol.com](mailto:ajrlaw@aol.com), [kberson@avrumrosenlaw.com](mailto:kberson@avrumrosenlaw.com), [kgeraci@avrumrosenlaw.com](mailto:kgeraci@avrumrosenlaw.com),  
[emeade@avrumrosenlaw.com](mailto:emeade@avrumrosenlaw.com), [lstalker@avrumrosenlaw.com](mailto:lstalker@avrumrosenlaw.com), [dldobbin@avrumrosenlaw.com](mailto:dldobbin@avrumrosenlaw.com),  
[fkantrow@avrumrosenlaw.com](mailto:fkantrow@avrumrosenlaw.com)

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Karamvir Dahiya, Esq.

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Cell: 646-420-9000

Monday, February 25, 2013 AOL: AJRLAW

Subj: **Re: Paperwork within our custody and control. Karamer v. Mahia closing stat...**  
Date: 2/1/2013 4:58:31 P.M. Eastern Standard Time  
From: [AJRLAW@aol.com](mailto:AJRLAW@aol.com)  
To: [karam@bankruptcypundit.com](mailto:karam@bankruptcypundit.com), [kberson@avrumrosenlaw.com](mailto:kberson@avrumrosenlaw.com), [fkantrow@avrumrosenlaw.com](mailto:fkantrow@avrumrosenlaw.com)

Please identify the last page of the document, and the same demand applies to these documents.

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[ajrlaw@aol.com](mailto:ajrlaw@aol.com)

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In a message dated 2/1/2013 4:50:49 P.M. Eastern Standard Time, [karam@bankruptcypundit.com](mailto:karam@bankruptcypundit.com) writes:

Attached is HUD statement. You have these papers and you had them from the previous attorney. As any other papers become available we will send your way.

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Karamvir Dahiya, Esq.

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doctrine, lack of jurisdiction owing to private rights, strictures of case law and Article III prohibition. I could not file the voluminous attachment to the Fred Kantrow motion for sanction as an exhibit, as ECF rejected it. Anyway enjoy your thanksgiving before we confront what the underlying motion adumbrates.

--  
Karamvir Dahiya, Esq.

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Attorneys  
350 Broadway Suite 412  
New York, New York 10013  
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Fax 212-766-8001

Cell: 646-420-9000

Karamvir S. Dahiya, Esq.  
Dahiya Law Group LLC  
350 Broadway Suite 412  
New York New York 10013

Tel: 212 766 8000  
Fax: 212 766 8001

Cell: 646 420 9000

[www.legalpundit.com](http://www.legalpundit.com)

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Subj: **mahia papers**  
Date: 2/4/2013 5:08:25 P.M. Eastern Standard Time  
From: [karam@bankruptcypundit.com](mailto:karam@bankruptcypundit.com)  
To: [AJRLAW@aol.com](mailto:AJRLAW@aol.com)

As other papers become available, we shall forward the same.

Karamvir S. Dahiya, Esq.  
Dahiya Law Group LLC

350 Broadway Suite 412  
New York New York 10013  
Tel: 212 766 8000  
Fax: 212 766 8001

[karam@legalpundit.com](mailto:karam@legalpundit.com)  
Cell: 646 420 9000

[www.legalpundit.com](http://www.legalpundit.com)

Monday, February 25, 2013 AOL: AJRLAW